

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No.: 23-cv-145

\$6,170.00 IN U.S. CURRENCY,

Defendant.

VERIFIED COMPLAINT IN REM

Plaintiff, United States of America, by its attorneys, Timothy M. O'Shea, United States Attorney for the Western District of Wisconsin, and by Heidi L. Luehring, Assistant United States Attorney, brings this complaint and alleges as follows in accordance with Supplemental Rule G (2) of the Federal Rules of Civil Procedure. The allegations in this Complaint are supported by a declaration from Special Agent Jessica Meier.

1. This is a civil action *in rem* brought to enforce the provision of 21 U.S.C. § 881(a)(6) for the forfeiture of all moneys furnished or intended to be furnished in exchange for a controlled substance, all proceeds traceable to such an exchange, and all moneys used or intended to be used to facilitate a violation of Title II of the Controlled Substances Act, 21 U.S.C. §§ 801 *et seq.*

2. The defendant property consists of \$6,170.00 in U.S. currency seized by the law enforcement on November 21, 2021, in Madison, Wisconsin.

3. Plaintiff brings this action *in rem* to forfeit and condemn the defendant property. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345 and over an action for forfeiture under 28 U.S.C. § 1355(a).

4. This Court has *in rem* jurisdiction over the defendant property under 28 U.S.C. § 1355(b). Upon the filing of this complaint, the plaintiff requests that the Court issue an arrest warrant *in rem*, pursuant to Supplemental Rule G(3)(b), which the plaintiff will execute upon the property pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

5. The defendant property is subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6) because it constitutes 1) money, negotiable instruments, securities and other things of value furnished and intended to be furnished in exchange for a controlled substance in violation of the Controlled Substances Act; 2) proceeds traceable to such an exchange; and 3) money, negotiable instruments, and securities used and intended to be used to facilitate a violation of the Controlled Substances Act.

6. Law enforcement officers investigated Quintin McGee for drug crimes. As part of that investigation, law enforcement monitored McGee's activities using court ordered electronic surveillance which showed bi-weekly trips to Chicago, a known narcotics source city to the Madison, Dane County area. McGee was also observed using multiple vehicles to make these trips which were followed by short term traffic at 4702 Dutch Mill Road, Trailer #39, Madison, Wisconsin and 218 Koster Street, Madison, Wisconsin upon McGee's return from Chicago. Surveillance showed McGee resided at

437 Park View Road, Deerfield, Wisconsin and spent significant time at 4702 Dutch Mill Road, Trailer #39, Madison, Wisconsin. McGee would typically stay at the Dutch Mill location all day and would typically only go to his residence to sleep and take his kids home. For example, through electronic surveillance, agents determined that McGee would travel to a school to pick up his children, drive to his residence in Deerfield, and only stay for 1-2 hours before coming back to Madison. On numerous occasions, McGee would travel from Dutch Mill Road to 218 Koster Street. Based on information received from sources, McGee brought cocaine to 218 Koster for others to distribute.

7. On November 19, 2021, law enforcement obtained search warrant for McGee's primary residence at 437 Park View Road, Deerfield, Wisconsin (Park View) and 4702 Dutch Mill Road, Trailer #39, Madison, Wisconsin (Dutch Mill).

8. Law enforcement learned that on November 21, 2021, McGee was returning to the Madison area from Chicago. They observed the vehicle arrive and park at the Dutch Mill Road property. Law Enforcement approached the vehicle and identified the driver as Danielle Bell and the passenger as McGee. Bell and McGee were informed that a search warrant was being executed on the vehicle and the Dutch Mill Property. McGee was searched and law enforcement located \$6,170.00 on his person.

9. Law enforcement searched the Dutch Mill Property and located approximately 22.3 grams of cocaine¹; four digital scales, 426 grams of marijuana²; several firearm accessories including magazines, a silencer, and a case; and a shoe box containing a Smith and Weston MP9 firearm and approximately 10.3 grams of cocaine base.

10. On November 21, 2021, law enforcement executed a search warrant on McGee's residence on Park View Road. Precious Thompson, her three children, and Thompson's father were present during the execution of the warrant. Law enforcement found a 10-carat gold chain with a 14-carat gold and diamond pendant with inscribed with "Killa Ward," "080," "8227," and "082"³; a Louis Vuitton bag containing \$5,020.00 in U.S. currency and a garbage bag containing 773.1 grams of cocaine and 2.7 grams of cocaine in the master bedroom. Law enforcement also found a Glock 19 Generation 5 pistol in the master bedroom between the mattress and box spring. In the closet of the master bedroom, officers located an ammunition box, three Glock backstraps, a Glock Box, two empty Glock magazines. In the basement of the residence, officers located a

¹ A random sample of the suspected cocaine tested positive for the presence of cocaine HCl and cocaine base using the Nark II #7 Scott Reagent Modified Pouch System Field Test.

² A random sample of the suspected marijuana tested positive for the presence of THC using the Nark II #5 Duquenois-Levine Reagent Pouch System Field Test.

³ The "Killa Ward" is faction of the Gangster Disciples (GD) street gang. According to the 2018 "Gang Book," a detailed overview of street gangs in the Chicago metropolitan area put out by the Chicago Crime Commission, most of the major sources of income for the GDs include narcotics sales, trafficking, armed robbery, auto theft, theft extortion (street taxes on independent dealers), kidnapping, money laundering, and mortgage fraud. The book also identifies factions of the Gangster Disciples, and lists "Killa Ward" as one of the factions of the GDs that controls 75th to 83rd Streets and Ashland Avenue to Wood Street, as well as 76th to 79th Streets and Ashland Avenue to Wood Street in Chicago.

suitcase containing approximately 442.6 grams of marijuana and a backpack containing a loaded pistol magazine, ammunition box, and a handgun box. In a first-floor closet, officers located a bag containing loose pistol ammunition.

11. Any additional facts and circumstances supporting the seizure of the defendant property are contained within the attached declaration and incorporated herein this complaint.

WHEREFORE, the United States of America prays:

- (1) that process of warrant be issued for the arrest of the defendant property;
- (2) that due notice be given to all parties to appear and show cause why the forfeiture should not be ordered;
- (3) that judgment be entered ordering the property to be forfeited to the United States of America for disposition according to law; and
- (4) that the United States of America be granted such other relief as this Court may deem just and proper, together with the costs and disbursements of this action.

Respectfully submitted this 3rd day of March 2023.

TIMOTHY M. O'SHEA
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